

## Chapter 6. Client File Update and Counseling Session Follow Up

### Overview

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## 1. Requirements for Completing the Client File

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### Introduction

This topic contains information on

- when to complete the client file
  - the required contents for client files, and
  - client file maintenance and security requirements.
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#### PROTCL 6.1.a When to Complete the Client File

The counselor must complete the client file at the end of the counseling session.

*Note:* The use of electronic files is acceptable.

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#### PROTCL 6.1.b Required Contents for Client Files

Client files must contain all of the items listed in [HECM Protocol 7.A.3](#).

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#### PROTCL 6.1.c Client File Maintenance and Security Requirements

Counseling agencies must maintain a separate, confidential file for every client.

The counselor must ensure that paper and electronic files are

- stored securely, and
  - only accessible to authorized individuals.
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## 2. Requirements for Follow Up After the Counseling Session

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**Introduction**

This topic contains information on the requirements for follow up after the housing counseling session, including

- the requirement for agency counseling work plans to detail procedures for follow up with clients
  - who may perform counseling session follow up
  - requirement for verbal or written client follow up
  - follow up to emergency counseling, and
  - sending a close-out or outcome letter to the client.
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**PROTCL 6.2.a  
Requirement  
for Agency  
Counseling  
Work Plans to  
Detail  
Procedures for  
Follow-Up  
With Clients**

The housing counseling work plan must detail the agency's procedures for follow-up communication with the client to

- confirm that the client is progressing toward his/her housing goals
  - learn outcomes, and
  - determine if the agency should modify or terminate counseling for the client.
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**PROTCL 6.2.b  
Who May  
Perform  
Counseling  
Session Follow  
Up**

A qualified housing counselor must conduct client follow-up.

**Note:** Hiring a third-party agency to conduct follow-up services is *prohibited*.

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## 2. Requirements for Follow Up After the Counseling Session, Continued

**PROTCL 6.2.c  
Requirement  
for Verbal or  
Written Client  
Follow Up**

The counselor should make reasonable efforts to conduct a verbal follow-up within 60 days after the counseling session (in person or by telephone).

The table below outlines the actions the counselor should take based upon whether or not he/she is able to reach the client by phone.

| If the counselor ...                                           | Then ...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | And ...                                                                                                                                                                                                            |
|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| is able to conduct a verbal follow up with the client by phone | <p>the counselor should</p> <ul style="list-style-type: none"> <li>• determine if the client is pursuing the loan, and</li> <li>• if so, <ul style="list-style-type: none"> <li>– review the information discussed during the counseling session and the materials provided to the client</li> <li>– emphasize that the client may call the counselor at any time after this initial phone call with questions or concerns, and</li> <li>– ask the client to let the agency know if he/she obtains a HECM.</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>• wait the appropriate amount of time for the certificate to expire, and</li> <li>• send a close out letter as discussed in <a href="#">HECM Protocol 6.2.e</a>.</li> </ul> |

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## 2. Requirements for Follow Up After the Counseling Session, Continued

### PROTCL 6.2.c Requirement for Verbal or Written Client Follow Up (continued)

| If the counselor ...                                                                       | Then ...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | And ...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| is unable to conduct a verbal follow up with the client by phone, despite several attempts | <p>the counselor must write a letter or send an e-mail to the client which</p> <ul style="list-style-type: none"> <li>• states that the counselor has attempted to follow up</li> <li>• informs the client that there is a need for follow-up communication, and</li> <li>• requests that the client contact the housing counseling agency no later than 30 days from the date sent, to help the agency assess if               <ul style="list-style-type: none"> <li>– additional client services are necessary to assist the client in achieving his/her housing goals, or</li> <li>– the agency should terminate counseling services.</li> </ul> </li> </ul> <p><b>Note:</b> Issuing surveys to assess housing outcomes does not meet the requirement for client follow-up.</p> | <p>upon being contacted by the client</p> <ul style="list-style-type: none"> <li>• provide any additional information/services, if necessary</li> <li>• wait the appropriate amount of time for the certificate to expire/loan to close, and</li> <li>• send a close out letter as discussed in <a href="#">HECM Protocol 6.2.e</a>.</li> </ul> <p><b>Note:</b> If the client does not respond to the letter/email, the counselor</p> <ul style="list-style-type: none"> <li>• waits the appropriate amount of time for the certificate to expire/loan to close, and</li> <li>• sends a close out letter as discussed in <a href="#">HECM Protocol 6.2.e</a>.</li> </ul> |

**Reference:** For

- a sample Follow-Up Letter, see [HECM Protocol 7.B.4](#), and
- more information on follow up requirements, see [HUD 7610.1 3.C.6](#).

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## 2. Requirements for Follow Up After the Counseling Session, Continued

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**PROTCL 6.2.d  
Follow Up to  
Emergency  
Counseling**

When the counselor performs emergency counseling and the client receives the information packet during or after the counseling session, counselors should

- wait 24 to 48 hours to contact the client so that the client has time to review the materials and consider his/her options, and
  - emphasize that the client may call the counselor at any time with additional questions or concerns.
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**PROTCL 6.2.e  
Sending a  
Close-Out/  
Outcome Letter  
to the Client**

After enough time has passed for the client to close on the reverse mortgage loan, the counselor must send the client a letter that

- reminds the client
  - of borrower obligations, and
  - to be cautious of insurance agents offering costly annuities to be purchased with the loan proceeds, and other individuals who may suggest uses for the loan proceeds that are not in the client's best interests
- encourages the client to call the counselor with any additional questions or concerns, and
- includes a survey for the client to report the outcome of the session.

**Notes:**

- Generally, the letter should go out three to six months after the counseling session.
  - An outcome letter is not necessary if the counselor has already called the client for follow-up and recorded the outcome (for example, the client has closed on the loan, the client has no additional questions or the client will not proceed with a reverse mortgage).
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